

November 12, 2001

Bill Pennington  
California Energy Commission  
1516 Ninth Street  
Sacramento, California 94244

Re: Glazing Area for the 2005 Residential Energy Standards

Dear Bill:

The California Association of Building Energy Consultants is strongly opposed to increasing the glazing percentage in the proposed design for the 2005 Residential Energy Standards. There are three primary reasons for our opposition:

First, to justify an increase in the proposed design glazing percentage based on the average percentage of glazing in homes statewide is irrelevant. Balancing reduced efficiency in some homes with an increase in efficiency in other homes seems inherently unfair to both builders and homebuyers.

Second, since the current standards have been shown to be cost effective by the Energy Commission, it seems unnecessary to relax the Energy Standards below their current threshold.

Third, after the significant increase in efficiency with the 2005 Standards it seems a giant step backwards to increase (or track) the proposed design glazing area by four percent.

Thank you for your consideration.

Sincerely

Douglas G. Beaman  
CABEC Chair